



# California Regional Water Quality Control Board

## Santa Ana Region



Dan Skopec  
Acting Secretary

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Arnold Schwarzenegger  
Governor

June 5, 2006

Base Realignment and Closure  
Attn: Mr. Darren Newton  
BRAC Environmental Coordinator  
7040 Trabuco Road  
Irvine, California 92618

### COMMENTS ON WORK PLAN FOR VADOSE ZONE CHARACTERIZATION AND SITE ASSESSMENT, FORMER UST GROUP 651, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: T0605901129


Dear Mr. Newton:

We have reviewed the above referenced document, dated March 16, 2006, which we received on March 17, 2006. We have the following comments:

- **Section 3.6, Reports, 4<sup>th</sup> Bullet - Nature and Extent of Contamination**, Page 3-6 and **Appendix A, 2.1 Purpose of the Investigation**, 2<sup>nd</sup> paragraph, last sentence, Page 2-1: The VLEACH model is identified for evaluation of the data that will be collected. In the past, Board staff has disagreed with aspects of the application of VLEACH modeling as it has been applied at your release sites. If VLEACH is applied as it has been in the past, it is likely that we will not accept the VLEACH model results as an accurate predictor of potential impact(s) to groundwater at this site.

For any questions, please call me at (951) 782-4494, or send email to [jbroderick@waterboards.ca.gov](mailto:jbroderick@waterboards.ca.gov).

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc via email: Ms. Lynn Hornecker, BRAC PMO WEST  
Ms. Content Arnold, BRAC PMO WEST

*California Environmental Protection Agency*



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